

Exhibit 1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 In Re:

4 OPENAI, INC.,
5 COPYRIGHT INFRINGEMENT
6 LITIGATION

Case No.:
I:25-md-03143-SHS

7 This Document Relates to:

8 Case No.: I :23-cv-08292-SHS

Case No.: I :23-cv-1 0211-SHS

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13 **HIGHLY CONFIDENTIAL - ATTORNEY'S EYES ONLY**

14 VIDEO-RECORDED DEPOSITION OF MICHAEL TRINH

15 30(b)(6) CAPACITY FOR OPENAI

16 Friday, July 25, 2025

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21 Stenographically reported by:
22 LORRIE L. MARCHANT, RMR, CRR, CCRR, CRC
California CSR No. 10523
23 Washington CSR No. 3318
Oregon CSR No. 19-0458
24 Texas CSR No. 11318

25 Job No.: 2025-992367
California Firm Registration No.: 179

1 BY MR. SMYSER:

2 Q. Okay. Apart from that Slack message
3 involving Mr. Radford describing his downloading of
4 the dataset that became known as Books1, were there
5 other documents that you recall reviewing in
6 preparation for this deposition?

7 A. Yes.

8 Q. What are they?

9 A. I recall reviewing source -- or, sorry, let
10 me -- before I move on from Slack, I recall
11 reviewing other Slack messages discussing Books2.

12 Q. Okay. Who were those Slack messages from
13 or involving?

14 A. I believe they all involved a former
15 employee named Ben Mann.

16 Q. And what was the content of those messages?

17 A. His general discussions about his review of
18 Books1 and -- or, sorry, the dataset that is
19 identified here as Books1 and his efforts to create
20 a -- a second dataset that is known under these
21 object- -- or responses and objections as Books2.

22 Q. And what did the messages say about his
23 review of Books1?

24 A. He discussed that he wanted to down- -- or
25 he -- he would create a second one.

1 Q. A second Books dataset; is that what you
2 understood?

3 A. Correct.

4 Q. And so what did he say about his efforts to
5 create Books2?

6 A. He describes -- he describes his
7 collections of -- of the data files that be- --
8 about the time that he did.

9 Q. And where did he collect the files from?

10 A. So I also reviewed excerpts of -- from his
11 deposition in which he discusses using a technology
12 called "torrenting."

13 T-O-R-R-E-N-T-I-N-G-S. Sorry.

14 Q. And so he used a technology called
15 torrenting, and what did he torrent?

16 A. I believe he torrented files also
17 associated with that website known as Library
18 Genesis.

19 Q. And so apart from these Slack messages
20 regarding Mr. Radford and Mr. Mann, were there other
21 Slack messages you reviewed in preparation for this
22 deposition?

23 A. Those are the ones that come to mind.

24 Q. Do you recall any other participants in
25 either of those Slack messages apart from

1 MR. GOLDBERG: Same objections. Objection
2 to the form. Beyond the scope.

3 THE WITNESS: I'm prepared to testify about
4 these versions.

5 BY MR. SMYSER:

6 Q. That wasn't my question, sir, with respect.

7 Are you aware of any other versions of the
8 Books1 and Books2 datasets apart from the four we
9 discussed and the intermediate copies you just
10 mentioned?

11 MR. GOLDBERG: Objection to the form.
12 Beyond the scope. Asked and answered.

13 THE WITNESS: I am aware that we -- that
14 there was a copy of one of these datasets recovered,
15 and I don't know if that's a -- if that's a version
16 or not.

17 BY MR. SMYSER:

18 Q. Do you know if that's the copy that's been
19 produced to us in this litigation?

20 A. That is my understanding.

21 Q. Okay. Apart from the copy that you
22 understand was produced to us in litigation, the
23 intermediate copies that we've discussed, and the
24 four versions that we've discussed, are you aware of
25 any versions of the Books1 and Books2 datasets?

1 THE WITNESS: The -- the decision to delete
2 was a company decision and so there are -- that --
3 it's a company decision.

4 BY MR. SMYSER:

5 Q. Okay. Let's talk about some of the others
6 that don't have asterixis.

7 Che Chang, why was -- I'm sorry, Mr. or
8 Mrs. Chang, why were they involved?

9 A. Mr. and it's Che.

10 Q. Apologies.

11 A. Yeah. He's -- Mr. Chang is a lawyer.

12 Q. Okay. And why was he involved?

13 A. There were -- these -- these discussions
14 were privileged; but, generally speaking, they
15 involved legal -- legal strategy, copyright risk,
16 and product legal strategy.

17 Mr. Chang is a product -- well, was then a
18 product counsel, among many things, but product
19 counsel was his -- is his primary function then.

20 Q. Okay. And Mr. Kwon, why was he involved?

21 A. Mr. Kwon was the general counsel at the
22 time.

23 Q. Okay. So returning to Mr. Pachocki, who's
24 not an attorney; correct?

25 A. Correct.

1 Q. What were the nonprivileged facts that he
2 conveyed during these oral communications?

3 MR. GOLDBERG: Objection. Beyond the scope
4 and assumes facts.

5 And, again, as we've meet -- met and
6 conferred about, as you've testified, these oral
7 communications were privileged.

8 MR. SMYSER: Are you instructing him not to
9 answer or ...

10 MR. GOLDBERG: There's no predicate on
11 which I -- I'd like to know whether he knows an
12 answer. But if -- but if the answer is based on
13 privilege, I'm instructing him not to answer. But
14 if the answer is "I don't know," he can answer that
15 because that's not privileged.

16 BY MR. SMYSER:

17 Q. Okay. Do you know if Mr. Pachocki conveyed
18 any nonprivileged or technical facts during these
19 oral communications you're discussing?

20 MR. GOLDBERG: Same objection. Beyond the
21 scope.

22 THE WITNESS: I was not informed of any.

23 BY MR. SMYSER:

24 Q. Any?

25 A. My understand- -- what I learned was that

1 the discussion was privileged, and it discussed --
2 well, as I said -- as I mentioned before -- legal
3 strategy, copyright, legal questions, and product
4 legal decisions.

5 Q. So you are not aware of any nonprivileged
6 facts conveyed during those oral communications?

7 A. I -- this discussion -- the discussion to
8 delete was led by legal, and it was -- and it -- it
9 incorporated those three things that I -- I
10 mentioned.

11 Q. I understand that.

12 But legal brought in these technical
13 people, correct, Bob McGrew, Jacob Pachocki, Alex
14 Paino, Lilian Weng, and Jeff Wu; right?

15 A. Correct.

16 Q. And brought them in due to their technical
17 role at OpenAI; correct?

18 A. Yes.

19 Q. And so what technical knowledge did they
20 have that was useful to this process? If you know.

21 A. I don't know the specifics.

22 Q. Are you aware of any specifics, any
23 specific technical knowledge that they had that
24 explains why they were consulted as part of this
25 series of oral communications?

1 models that they may have been used to train at the
2 time of these oral communications we're discussing?

3 MR. GOLDBERG: Objection to the form.

4 THE WITNESS: I am aware that these -- the
5 datasets were no longer being used generally.

6 BY MR. SMYSER:

7 Q. Okay. What do you mean by "generally"?

8 A. So, for example, if they were already
9 incorporated in a training run and had already been
10 used, those models still -- were still -- still in
11 existence and still, you know, operating.

12 Q. And you're not aware of the datasets being
13 used for anything else at the time of these oral
14 discussions?

15 A. Correct.

16 Q. Okay. When did those oral discussions take
17 place?

18 A. June into July 2022.

19 Q. Do you know specific dates?

20 A. I believe there was -- a lot of activity
21 was in -- particularly in mid-July, 16th or 17th.

22 Q. And do you know the earliest date in June
23 that the discussions took place?

24 A. Not specifically, no.

25 Q. Do you know generally in June when the

1 Books1 and Books2 used to train GPT-3 deleted?

2 A. Yes.

3 Q. And were the versions of Books1 and Books2
4 used to train GPT-3.5 deleted?

5 A. Yes.

6 Q. And all of the versions used for those two
7 models were deleted; is that correct?

8 MR. GOLDBERG: Objection to the form.

9 THE WITNESS: We did recover a copy of
10 one -- of a set of versions.

11 BY MR. SMYSER:

12 Q. Understood you recovered a copy.

13 But were all the versions deleted
14 initially?

15 MR. GOLDBERG: Objection to form.

16 THE WITNESS: That was the intent.

17 BY MR. SMYSER:

18 Q. Was it the actuality?

19 A. Like I said, we recovered that one copy
20 of -- of -- of -- we -- we recovered one copy.

21 Q. Were all the copies used to train GPT-3
22 deleted prior to any recovery?

23 MR. GOLDBERG: Objection to the form.

24 Asked and answered.

25 THE WITNESS: We -- like I said, we

1 recovered a copy. It was not -- we found a copy.
2 It was not -- I'm -- I'm pausing when you say the --
3 when I use the word "recovered," I didn't mean,
4 like, we undeleted it or something. Like, we -- we
5 located a copy of what we believed to be the version
6 that trained Books3.

7 BY MR. SMYSER:

8 Q. Okay. So for the versions used to train
9 Books3 --

10 A. Sorry. Sorry. For the versions -- I'm
11 tying myself in a knot.

12 For the versions of Books1 and -2 used to
13 train GPT-3, we recovered a copy of what we believe
14 to be those datasets, that version.

15 Q. So for the versions used to train GPT-3,
16 not all of those versions -- or rather, not all of
17 those copies were deleted in 2022; correct?

18 A. Because we know of that one copy, we know
19 at least one copy, like, was -- was not deleted.

20 Q. Okay. Where was that copy?

21 A. We -- OpenAI recovered a copy of those
22 versions in -- it was -- my understanding, it was in
23 a -- it was somewhere in a (inaudible) --

24 (Stenographer interrupted for clarification
25 of the record.)

1 THE WITNESS: Sorry. Azure Blob store.

2 BY MR. SMYSER:

3 Q. And do you know why it was not deleted
4 along with the other copies?

5 MR. GOLDBERG: Objection. I think that's
6 beyond the scope.

7 THE WITNESS: No one was aware that that
8 copy existed.

9 BY MR. SMYSER:

10 Q. Okay. Do you know where on Azure Blob
11 store it was?

12 A. I don't have that specific location, no.

13 Q. Do you have a general understanding of
14 where it was on Azure Blob store?

15 A. It was -- my understanding is it was not
16 in -- it was in a section of Blob store that was not
17 widely available -- widely available -- sorry,
18 widely available, and it wasn't part of the areas
19 that we commonly store datasets.

20 Q. Okay. Is there any other information you
21 can give me about what this section of the Blob
22 store was?

23 A. We searched broadly, and they -- Ian Sohl
24 located this -- this -- these files.

25 Q. Would he know the specifics about where the

1 files were recovered from?

2 A. You'd have to ask him.

3 Q. In your preparation for this, did you ask
4 him how he recovered the files?

5 A. He described searching broadly across Azure
6 Blob store.

7 Q. Okay. Do you know how he searched?

8 A. I believe he did a manual search.

9 Q. What do you mean by "manual search"?

10 A. As in, he didn't write a script to conduct
11 the search. He just was looking for it himself.

12 Q. And to what did he do to look for it
13 himself, to the extent you know?

14 A. He used the tools available in Azure to
15 search across Blob store.

16 Q. Do you know what those tools are?

17 A. Not in technical specifics, no.

18 Q. Okay. In technical generalities, do you
19 know what those tools are?

20 A. So just generic search functionality.

21 Q. Okay. Do you know if Mr. Sohl identified
22 the now-recovered copy of the Books1 and Books2
23 datasets using a string search or by searching for
24 the name of the dataset or something else?

25 MR. GOLDBERG: Objection to the form.

1 THE WITNESS: I believe he searched across
2 file names using strings.

3 BY MR. SMYSER:

4 Q. So it's your understanding that he located
5 the recovered version of the Books1 and Books2
6 datasets used to train GPT-3 by searching for the
7 file names in Azure Blob store; correct?

8 MR. GOLDBERG: Objection to the form.

9 THE WITNESS: That is my understanding,
10 yes.

11 BY MR. SMYSER:

12 Q. And when he performed that same process
13 with respect to the names on Exhibit 279 for the
14 GPT-3.5 Books1 and Books2 datasets, he did not
15 locate copies of those; correct?

16 A. He was only able to locate copy -- a copy
17 of the versions that we believe were used to train
18 GPT-3.

19 Q. And the section of the Blob store that he
20 located these versions in, you mentioned it was not
21 widely available; is that right?

22 A. That is my understanding.

23 Q. Why was it not widely available?

24 MR. GOLDBERG: Beyond the scope.

25 THE WITNESS: I don't know the specifics.

1 My general understanding is that this was a -- this
2 area -- this was not a -- to be honest with you, it
3 was old and forgotten.

4 BY MR. SMYSER:

5 Q. Okay. Do you have any more information
6 about that section of the Blob store that you can
7 give me?

8 A. Not in specifics, no.

9 Q. Any general information you can give me in
10 addition to what we've already discussed?

11 A. I've described that it's old, and it was
12 not -- you know, not -- it was not the area where we
13 actually store datasets for use in training.

14 Q. Was it somebody's personal account?

15 A. I -- I don't know.

16 Q. Okay. So you don't know one way or another
17 whether it was somebody's personal account?

18 A. Correct.

19 Q. Okay. But Mr. Sohl would know?

20 MR. GOLDBERG: Objection to the form.

21 THE WITNESS: You could ask him.

22 BY MR. SMYSER:

23 Q. Okay. Do you know if -- well, actually,
24 let's step back.

25 Do you know how Alec Radford obtained the

1 LibGen-1 dataset?

2 A. My understanding is that he accessed it via
3 direct download from a -- from a website.

4 Q. Do you know what website?

5 A. I believe it was associated with LibGen.

6 Q. And when you say "direct download," what do
7 you mean by that?

8 A. An HTTP GET request.

9 Q. And was that -- is that different from
10 torrenting, in your understanding?

11 A. Yes.

12 Q. How is it different from torrenting, in
13 your understanding?

14 A. So an HTTP GET request -- sorry, HTTP GET
15 request is a protocol -- or is a request under the
16 HTTP protocol, which is how you pull files from
17 generally the Internet, commonly from a website. It
18 is -- involves a client making a request directly to
19 a server.

20 And then -- and then the server responds to
21 the GET request by providing the file or whatever is
22 requested by the GET request.

23 Now, a torrent is not part of the HTTP
24 protocol. It is -- refers generally to a
25 peer-to-peer -- my understanding is a peer-to-peer

1 model where the -- the information can come from
2 computers, besides the server, that you make the
3 request of.

4 Q. Does OpenAI still have a copy of the HTTP
5 GET request?

6 MR. GOLDBERG: Objection. Beyond the
7 scope.

8 THE WITNESS: HTTP GET requests are by
9 their nature ephemeral; right? It's, you know,
10 something that your computer issue- -- like, for
11 example, if you go to a particular website, your
12 computer issues a GET request for the web page at
13 that website and then it gets a response. That's
14 just kind of normal network traffic.

15 So -- so the answer is, no.

16 BY MR. SMYSER:

17 Q. Does OpenAI have any records of that
18 download?

19 MR. GOLDBERG: Objection to the form.
20 Beyond the scope.

21 THE WITNESS: I did not review any.

22 BY MR. SMYSER:

23 Q. And you're not aware of any apart from
24 those that you didn't review?

25 MR. GOLDBERG: Same objection.

1 torrenting file from LibGen or not; correct?

2 A. Correct.

3 Q. Okay. When were the versions of Books1 and
4 Books2, apart from the recovered version, deleted?

5 A. July 2022.

6 Q. Do you know approximately what days or day?

7 A. I think it's in that mid-July time frame.

8 Q. And at that time OpenAI and other AI
9 developers, they faced substantial legal uncertainty
10 about whether training their models on copyrighted
11 works was fair use; is that correct?

12 MR. GOLDBERG: Objection to the form.
13 Beyond the scope. Incomplete hypothetical. Assumes
14 facts.

15 THE WITNESS: Could you repeat the
16 question?

17 BY MR. SMYSER:

18 Q. So in July 2022, OpenAI and other AI
19 developers faced substantial legal uncertainty about
20 whether training their models on copyrighted works
21 was fair use; is that correct?

22 MR. GOLDBERG: Objection. Form. Beyond
23 the scope. Incomplete hypothetical. Assumes facts.

24 THE WITNESS: The -- the company hadn't
25 been sued, and that was probably almost a year

1 nonprivileged facts identifying the
2 persons directly involved in deletion of
3 Books1" -- apologies -- "in the deletion
4 of the Books1 and Book2 datasets and the
5 nature of the involvement of each person
6 directly involved in the deletion of the
7 Books1 and Books2 datasets."

8 Do you see that?

9 A. I do.

10 Q. And are you prepared to testify as to that
11 scope?

12 A. I am.

13 Q. Okay. So who was directly involved in the
14 deletion of the Books1 and Books2 datasets?

15 A. I spoke with Alex Paino, and he's the one
16 who deleted the datasets.

17 Q. Okay. So was he the only person directly
18 involved in the deletion?

19 A. He was the one who deleted it. There -- he
20 told me that Jeff Wu was involved in modifying
21 source code that referred to the -- to the deleted
22 datasets.

23 Q. Okay. And when you say "modifying source
24 code that referred to the deleted datasets," what do
25 you mean by that?

1 A. With the datasets no longer there, soft --
2 or source code that referred to it and would look --
3 look for those datasets, they were modified to
4 remove the references to the datasets.

5 Q. And is it your understanding that the
6 source code prior to those modifications is still
7 within OpenAI's possession?

8 A. Those would be -- the earlier versions
9 pre -- pre-Jeff Wu's modifications still exist, yes.

10 Q. Okay. And do you know if they've been
11 produced in this action?

12 A. That is my understanding.

13 Q. Okay. So by "directly involved," you mean
14 either, in the case of Mr. Paino, that they deleted
15 the datasets themselves or, in the case of Mr. Wu,
16 that they modified source code that referred to
17 those datasets; is that correct?

18 A. That is my understanding, yes.

19 Q. Is there anything else meant by "directly
20 involved"?

21 A. I don't imply anything else there with that
22 term.

23 Q. Okay. When we were looking at Exhibit 279
24 earlier, the third table here, you recall there were
25 a number of technical people listed who were not

1 Mr. Wu or Mr. Paino; correct?

2 A. Correct.

3 Q. And it's your testimony that those
4 technical people were not directly involved in the
5 deletion of Books1 or Books2; is that correct?

6 A. I believe they were involved in the
7 discussions, but in terms of the -- the operation of
8 deletion, it's -- I discussed Mr. Paino and Mr. Wu.

9 Q. Okay. So just to be clear, when you're
10 saying they were directly involved in the deletion,
11 you mean directly involved in effectuating that
12 deletion?

13 A. The technical, like, deletion, yes.

14 Q. Okay. And then apart from Mr. Paino and
15 Mr. Wu, was there anyone else, to your knowledge,
16 directly involved with the technical aspects of the
17 deletion?

18 A. I did not find -- I -- I did not find any
19 information beyond those two.

20 Q. Okay. And so the other individuals listed
21 on Exhibit 279 you indicated are directly involved
22 with the decision to delete Books1 and Books2;
23 correct?

24 MR. GOLDBERG: Misstates testimony.

25 THE WITNESS: They were involved in the

1 yes.

2 Q. And the one that Tom Rubin worked at, at
3 the time, was one of those law firms providing legal
4 advice in connection with the decision to delete
5 Books1 and Books2; correct?

6 A. Correct.

7 Q. And what about Joe Gratz? Was he involved
8 in the decision to delete Books1 and Books2?

9 A. He was -- I -- he was employed at
10 Morrison & Foerster, which is another law firm that
11 gave advice to OpenAI, Jason and Che.

12 Q. In connection with the deletion of Books1
13 and Books2?

14 A. Mo -- MoFo, Morrison & Foerster -- I'll say
15 that on the record -- gave advice on that, yes.

16 Q. Okay. And do you know for sure one way or
17 another if Mr. Gratz was involved in that decision?

18 A. I -- I don't have any information on that.

19 Q. Okay. And what about Tom Gorman, was he
20 involved in the decision to delete Books1 and
21 Books2?

22 A. I believe he's employed at Keker Van Nest,
23 and I don't have any information that Keker &
24 Van Nest provided guidance on -- on the -- on this
25 issue.

1 page 14 of Exhibit 278.

2 A. Thank you for the page number.

3 Q. So do you see the first sentence of the
4 first full paragraph on that page (as read):

5 "Without waiving any of these
6 objections, OpenAI will provide
7 nonprivileged facts regarding the
8 technical steps undertaken for the
9 deletion of the Books1 and Books2
10 datasets"?

11 A. Yes.

12 Q. And you're prepared to testify as to those?

13 A. Yes.

14 Q. Okay. So did OpenAI undertake technical
15 steps to identify the copies of the Books1 and
16 Books2 datasets that needed to be deleted?

17 A. Yes.

18 Q. What were those technical steps?

19 A. Alex Paino is the engineer who worked with
20 those datasets and identified locations in the --
21 where -- the locations -- datasets that had been
22 used to train GPT-3 and GPT-3.5.

23 Q. And what technical steps did he take to
24 perform that identification?

25 A. He was aware of their -- their use in

1 training and the steps that had been taken in
2 between the GPT-3.5 versions and the -- and the
3 GPT-3.5 versions and identified those locations and
4 deleted the files there.

5 Q. And when you say he identified the
6 locations, were those on, as you've called it, the
7 Azure Blob Storage?

8 A. Yes.

9 Q. Was that the only place they were?

10 A. That is the location of -- that is the --
11 the location that was used to train, yes.

12 Q. Okay. And just to be clear, you mentioned
13 the intermediate copies as part of that -- the
14 penultimate answer; correct?

15 A. Yes.

16 Q. And were those also on the Blob Storage, is
17 what I'm trying to get at, to your knowledge?

18 A. I -- Blob Storage is the place that we
19 would -- that we use generally for these -- this
20 sort of thing. So there may have been processing
21 elsewhere, but that's where the -- all -- that's
22 where the datasets are stored.

23 Q. Okay. And I think you mentioned that
24 Alex Paino made this identification by virtue of the
25 fact that he worked with these datasets previously;

1 is that correct?

2 A. Yes.

3 Q. And so did he perform any, I guess,
4 additional technical steps apart from his own
5 knowledge that helped him identify where these
6 copies were?

7 A. He -- he was the person at the company who
8 knew where these datasets were and how they were
9 used so he -- he was instructed to delete.

10 Q. Understood.

11 I'm trying to understand how he figured
12 out, "Here's every copy of this I need to delete."

13 And is the testimony just that he -- he
14 knew where they were because he previously worked
15 with them, or did he also do some technical search
16 to determine where the other copies were?

17 MR. GOLDBERG: Objection to the form.

18 THE WITNESS: I believe he did a technical
19 search. And he's -- he's familiar with these
20 datasets. He's the most -- he -- and he was -- you
21 know, I think the fact that we were unable to
22 recover any other copies -- well, except for the one
23 I previously described -- you know, kind of -- I
24 think that speaks for itself.

25 ///

[illegible]

1 A. Correct.

2 Q. And it was Mr. -- was it Mr. Sohl or
3 Mr. Paino who located it?

4 A. Sohl.

5 Q. Mr. Sohl located it.

6 A. Yeah.

7 Q. Do you know when he located it?

8 A. I think it was sometime last year.

9 Q. So in 2024 sometime?

10 A. I believe so, yes.

11 Q. And how does OpenAI know that the versions
12 recovered by Mr. Sohl correspond to the versions
13 used to train GPT-3?

14 A. The files that he recovered involve
15 something called a UUID. And we've seen evidence
16 that it's the same UUID that was used in the GPT-3
17 training run.

18 Q. Okay. What is a UUID?

19 A. It a technical acronym, and I actually --
20 it's something about a universal identifier. This
21 is -- this is an external one's -- external
22 definition.

23 So it's commonly used. It's not specific
24 to OpenAI. But it is a unique identifier that you
25 can -- that you can create. I believe the

A horizontal bar chart consisting of 20 black bars of varying lengths. The bars are arranged in a single column, with the longest bar in the middle and the shortest bars at the top and bottom. The bars represent a distribution of data, with the longest bar in the middle and the shortest bars at the top and bottom.

171

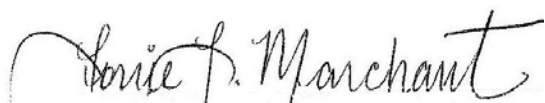
[illegible]

STENOGRAPHER'S CERTIFICATE

I, LORRIE L. MARCHANT, Certified Shorthand Reporter, Certificate No. 10523, for the State of California, hereby certify that MICHAEL TRINH was by me duly sworn/affirmed to testify to the truth, the whole truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place herein named; that the deposition is a true record of the witness's testimony as reported to the best of my ability by me, a duly certified shorthand reporter and a disinterested person, and was thereafter transcribed under my direction into typewriting by computer; that request [] was [X] was not made to read and correct said deposition.

I further certify that I am not interested in the outcome of said action, nor connected with, nor related to any of the parties in said action, nor to their respective counsel.

IN WITNESS WHEREOF, I have hereunto set my hand this 6th day of August, 2025.



LORRIE L. MARCHANT, RMR, CRR, CCRR, CRC
Stenographic Certified Shorthand Reporter #10523